

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Arelis A. Pizarro-Williams Antonie S. Williams <u>Debtor(s)</u> <u>vs.</u> Quicken Loans, LLC <u>Respondent</u>	CHAPTER 13 CASE NO. 20-12225 ELF
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**LIMITED RESPONSE OF QUICKEN LOANS, LLC FORMERLY KNOWN AS (FKA)
QUICKEN LOANS INC. TO DEBTOR'S MOTION TO SELL REAL ESTATE**

Respondent, Quicken Loans, LLC Formerly Known as (FKA) Quicken Loans Inc., by and through its counsel, KML Law Group, P.C., hereby responds to the Debtor's Motion to Sell Real Estate as follows:

1. Respondent's loan is secured by a mortgage on Debtors' Property located at 112 Central Avenue, Morrisville, PA 19067.
2. The proposed order calls for the Property to be sold without language stating that Respondent's loan will be paid in full.
3. As of June 21, 2021, the amount to pay off the total debt was \$171,546.78.
4. However, this amount is subject to change, and thus the loan must be paid in full subject to a proper payoff at the time of the sale.
5. Respondent files this limited objection to Debtor's Motion to Sell as Debtor's proposed Order does not provide for Respondent's loan to be paid in full at the time of sale, subject to a proper payoff quote, or that the lien will otherwise remain on the Property.

Wherefore, Respondent respectfully requests that Debtor's Motion be denied.

/s/ Rebecca A. Solarz, Esquire

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Date: June 10, 2021